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EXPERIAN INFORMATION SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

PERRY J. FERRUCCI AND BETSY P.
FERRUCCI,

Plaintiffs,

v.

BANK OF AMERICA, N.A.; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendants.

Case No. 2:20-cv-01043-JAM-KJN

Hon. John A. Mendez

**STIPULATION AND ORDER RE:
EXTENSION OF DEADLINE TO FILE
DISPOSITION DOCUMENTS**

Complaint filed: May 21, 2020

Plaintiffs Perry Ferrucci and Betsy P. Ferrucci along with the Defendant Experian Information Solutions, Inc. ("Experian"), pursuant to Local Rule 160(d), hereby stipulate and agree that good cause exists for extending the deadline by which to file disposition documents by thirty (30) days.

1. Plaintiffs filed a notice of settlement on February 2, 2022. (ECF No. 55).

2. That same day, the Court ordered the parties to file dispositional documents within sixty (60) days in accordance with Local Rule 160. (ECF No. 56.) Sixty days from February 2, 2022 is Sunday, April 3, 2022, and therefore the final dispositive documents are due by April 4, 2022. *See* Fed. R. Civ. P. 6 (a)(1)(C) ("[I]f the period would end on a Saturday, Sunday, or legal

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1 holiday, the period continues to run until the same time on the next day that is not a Saturday,
2 Sunday, or legal holiday.”)

3 3. Despite the diligence of the parties, they have been unable to agree to the terms of
4 the final settlement agreement. The parties remain committed, however, to finalizing the
5 settlement agreement and remain in constant communication to reach mutually agreement
6 settlement terms.

7 4. The Parties believe that allowing a thirty (30) day extension will serve the ends of
8 judicial economy and permit the Parties to reach a final settlement agreement.

9 5. The Parties have agreed to seek this extension for good cause, in good faith, and
10 not for the purpose of delay. The Part do not anticipate any need to request additional time beyond
11 the thirty (30) day period requested herein.

12 6. Accordingly, the Parties jointly stipulate to and request of this Honorable Court
13 that it grant a thirty (30) day extension to file disposition documents.

14 WHEREFORE, Plaintiffs and Defendant pray that this Court extend the above-referenced
15 deadline and execute the proposed Order regarding the same, which is filed herewith, and for all
16 other just and appropriate relief.

17 Dated: April 4, 2022

18 JONES DAY

19 By: /s/ Matthew T. Billeci
20 Matthew T. Billeci

21 Attorneys for Defendant
22 EXPERIAN INFORMATION SOLUTIONS,
23 INC.
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25

ZEMEL LAW, LLC

By: /s/ Daniel Zemel

Daniel Zemel, Esq.

Attorney for Plaintiff

PERRY J. FERRUCCI and BETSY P.

FERRUCCI

ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HEREBY ORDERED that the parties shall have an additional thirty (30) days from the date of this order to file dispositional documents in accordance with the provisions of Local Rule 160.

Dated: April 4, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE